

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING)	
PHARMACY, INC., PRODUCTS LIABILITY)	
LITIGATION)	MDL No.: 2419
)	Master Docket No.: 1:13-md-2419
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THIS DOCUMENT RELATES TO:)	
)	
All Actions Against Specialty Surgery Center and)	
Dr. Kenneth Lister)	
)	
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MOTION FOR LEAVE TO EXCEED PAGE LIMIT

The Plaintiffs' Steering Committee ("PSC") hereby moves for leave to file a Memorandum of Law in support of its Motion for Sanctions and for Order to Show Cause in excess of the twenty (20) page default limit under Local Rule 7.1(b)(4). The PSC's Memorandum, filed contemporaneously herewith, is twenty-four (24) double-spaced pages. Because the PSC is requesting leave for fewer than five additional pages, pursuant to MDL Order No. 11 Part C the PSC has contacted opposing counsel concerning this requested extension on today's date but has not yet received a response concerning the defendants' position. Accordingly, the PSC files this request as a motion.

The PSC requests this extension because the issues presented in the Motion for Sanctions and for Order to Show Cause are complex and involve the consideration of multiple prior court orders, the evaluation of claims of multiple forms of privilege over hundreds of documents by multiple entities, and the PSC's articulation of several independent grounds on which it contends that production of the underlying records is warranted.

Date: December 15, 2016

Respectfully submitted:

/s/ J. Gerard Stranch, IV

J. Gerard Stranch, IV

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Plaintiffs' Steering Committee

CERTIFICATE OF SERVICE

I, J. Gerard Stranch, IV, hereby certify that I caused a copy of the foregoing document to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Date: December 15, 2016

/s/ J. Gerard Stranch, IV
J. Gerard Stranch, IV